



Blackbelt Broadcasting Inc.
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

June 24, 2017

In the Matter of)	MB Docket No. 17-105
Modernization of Media Regulation)	RM-_____
Initiative)	

To: Marlene H. Dortch, Secretary
Federal Communications Commission
Office Of The Secretary

Chief, Media Bureau

COMMENTS OF BLACKBELT BROADCASTING , INC.

These comments are filed by Blackbelt Broadcasting, Inc. with respect to the above-referenced proceeding, Blackbelt Broadcasting, Inc. feels that the following regulations and Commission policies should be reviewed and or modified:

1. Assessment and collection of regulatory fees

The following comments are in reference to the increase of FCC regulatory fees. Blackbelt Broadcasting Inc. is the licensee of WLYB FM (Class A) Livingston, Alabama

(population 3,400) and WRYC FM (Class A) Frisco City, Alabama (population 1,300). We provide radio service to the most financially challenged Counties in the nation. Most small businesses (including radio) find it a struggle to generate revenue and keeping the doors open. In recent months, we have lost a grocery store, and several other businesses. The community of WLYB FM Livingston Alabama (COL) doesn't have a car dealership, a hospital facility, or furniture store. Even the post office is open on a limited schedule. Advertising revenue is limited. We respectfully request that the current proposed regulatory fees (and structure) be reevaluated, reduced, or waived for certain classes of small market radio stations based on size class, and (or) revenue. We ask you to consider the burden that increasing regulatory fees has on many small rural AM and FM broadcasters.

2. Relaxation of translator ownership rules

FM primary stations should have the option of owning an existing translator in their market. If the translator can pick up the "over the air" terrestrial signal of the FM primary station, the primary station should be allowed to own that translator beyond the current restrictions (60db coverage area). This would allow many rural stations to serve communities with a much improved signal from the primary station.

3. Lift restrictions on lottery advertising

The Commission currently prohibits WLYB FM and WRYC FM from running lottery advertisements from neighboring states. This issue affects stations in Alabama, Hawaii, Mississippi, and Utah. Blackbelt Broadcasting Inc. respectfully asks that the Commission discontinue the prohibition of lottery advertisements.

4. Relaxation of third adjacent FM separation standards

Blackbelt Broadcasting Inc. respectfully requests that the Commission relax, or discontinue altogether, third-adjacent Section 73.207 and 73.215 FM broadcast separation protection standards for all station classes, provided that in the case of relaxation, an intended licensee can demonstrate that its proposed facilities and antenna system would not cause any real world interference to third-adjacent stations. As selectivity and adjacent channel protection ratios in modern receivers have (generally) steadily improved over the past few decades,

Blackbelt Broadcasting Inc. asserts that third-adjacent separation standards are largely unnecessary. If, however, the Commission cannot abandon third-adjacent spacings completely, then Blackbelt Broadcasting Inc. believes that an intended licensee should be given the opportunity to demonstrate that its actual facilities would not cause interference to neighboring stations, much as FM translator services (and LPFM stations, which may largely ignore third-adjacent spacing tables) are able to do now. In the case of the FM allocations process for new full-power stations, third-adjacent channel separations could be ignored throughout the allotment proceeding, but as part of its accompanying Form 301 new station application, the original petitioner would have to demonstrate that a valid compliant tower site and FM antenna transmission system exists prior to said allocation proposal receiving public comment. Blackbelt Broadcasting Inc. respectfully contends that such a change would allow hundreds of full power stations an opportunity to relocate or upgrade to less congested channels without impacting the actual signals of neighboring stations.

5. Automatic 73.215 Conference Procedure to Underbuilt FM stations

As part of an earlier-filed petition, authored by the (now) Multicultural Media, Telecom, and Internet Council (MMTC, RM-11727) and SSR Communications, Inc. Blackbelt Broadcasting Inc. respectfully asserts that non-reserved band FM full power stations that are authorized under Section 73.207 of the Commission's Rules should be subject to 73.215 reclassification, provided that said stations have been underbuilt for a period of at least ten years preceding the filing of a valid competing "triggering" application of a neighboring station. If a subject station is not and has not been operating at its maximum tower height and/or effective radiated power level (or the equivalent combination thereof) for more than a decade, a station with a specific competing proposal that is otherwise blocked from enhancing or upgrading its own signal would be able to do so through an automatic 73.215 conference procedure to the underbuilt station. This policy would not affect all underbuilt stations uniformly, but rather, reclassify only those who face a specific completing FM application from an adjacent station, much as the Commission's FM Class C to Class C0 downgrade procedure.

SSR Communications, Inc. petitioned the Commission for this change as part of RM-11727 in 2013, as well as a broader similar proposal as part of RM-11643 in 2011, the Commission has yet to act on either initiative. As in the previous proposal herein, Blackbelt Broadcasting Inc. respectfully contends that such a change would allow hundreds of full power stations an opportunity to relocate or upgrade to less congested channels without impacting the actual signals of neighboring stations.

In conclusion, Blackbelt Broadcasting Inc. would like to thank the Commission for taking the time and effort to review these suggestions, and to modernize the current rules.

Respectfully Submitted,

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